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Radio Technical Commission for Maritime Services

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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 6 1993

In the Matter of)
)
Amendment of the Commission's Rules)
Concerning Maritime Communications)

FCC - MAIL ROOM

PR Docket No. 92-257

REQUEST BY THE
RADIO TECHNICAL COMMISSION FOR MARITIME SERVICES
FOR EXTENSION OF COMMENT AND REPLY COMMENT PERIODS

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits the following request for extension of comment and reply comment periods in response to the Commission's combined Notice of Proposed Rule Making and Notice of Inquiry in the above entitled matter.

The RTCM is a non-profit organization whose objectives include studying and preparing reports on maritime telecommunications practices, needs and technologies with a view toward improving the efficiency and capabilities of maritime telecommunications services, suggesting ways to keep rules and regulations to the minimum essential for effective maritime telecommunications and making recommendations on important issues involving maritime telecommunications.

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The Commission's recent rule changes relating to implementation of the Global Maritime Distress and Safety System (GMDSS) were, of course, directly applicable to compulsory ships, as noted in the NPRM/NOI under consideration. The GMDSS concepts implemented for compulsory ships represent significant changes in technological and operating concepts both for those ships and for the entire maritime community, with the potential for creating incompatibilities in both safety and general communication systems and operating concepts between compulsory and non-compulsory ships. The RTCM is of the view that these issues, as well as others related to the efficiency and effectiveness of communications for non-compulsory ships need to be considered by the entire maritime community. In this light the issues raised in the Commission's proposal are most appropriate for public comment. The RTCM believes that their resolution will have a substantial impact upon the effectiveness of future maritime telecommunications systems in providing both safety and general communication services for the mariner, whether associated with compulsory or non-compulsory ships.

The RTCM also notes that the Commission's proposals in the NPRM/NOI under consideration will impact on all elements of the maritime community including sales and service dealers, manufacturers, common carrier and other service providers, governmental authorities, and operators of both compulsory and non-compulsory ships of all sizes, whether they are carrying particular equipment on a mandatory or a voluntary basis or to meet a safety or a general communications requirement.

In this regard it should be noted that a majority of the affected community depends on organizations such as the RTCM to advise them of the proposals, provide them with copies, and work with them to examine the issues, consider the potential impact, and develop meaningful comments and recommendations.

The RTCM currently has over 150 member organizations, virtually all of whom will be affected by the proposals of the NPRM/NOI. It is not possible within the resources available to the RTCM and the maritime community to ensure that all who will be affected are informed, that the diversity of interests and views are coordinated where possible, and that meaningful comments and recommendations are submitted within the allotted time.

In the case of this combined NPRM/NOI, both the extremely broad scope of the inquiry and proposals and their potential impact on smaller entities greatly increase the time required to ensure that those affected are aware of the notice, understand its intent, and have opportunity to provide comments.

In the NPRM/NOI it is apparent that extensive thought has gone into the well developed comments laid out in paragraphs 6 through 42. The RTCM fully supports the conclusions in paragraph 43 in regard to the inherent difficulty in projecting maritime communication needs for the future and the consequent need for public response that is detailed, specific and comprehensive.

Recognizing that comments which meet those criteria can only be

developed through extensive interaction with the community, the RTCM believes that the ideal forum for discussion of the issues with representatives present from virtually all affected areas of the maritime community is the RTCM Annual Assembly Meeting, which will be held during the period May 2-7, 1993. An open docket at the time of that meeting would substantially enhance the opportunity for a wide-ranging discussion of the issues among those affected in the maritime community and the likelihood of meaningful comments in formal responses submitted subsequently to the Commission. Further, bearing in mind that the issues are particularly important to smaller maritime entities least able to cope effectively with the administrative procedures of standard regulatory processes, a somewhat longer than usual period for reply comments would be helpful not only to the maritime community, but also to the Commission.

Accordingly, in order to meet the goals cited above, the RTCM respectfully requests extension of the comment period to June 1, 1992 and of the reply comment period to July 15, 1992.

Respectfully submitted,

RADIO TECHNICAL COMMISSION
FOR MARITIME SERVICES

by W. T. Adams
W.T. Adams
President

Dated this 4th day of January, 1993